



WHISTLEBLOWER POLICY

1. PERKINS BUILDERS' COMMITMENT

Perkins is committed to ensuring that its business is conducted in an honest and ethical manner. Perkins has a desire to establish and nurture a culture where employees and others can raise concerns regarding any serious unlawful or inappropriate behaviour without fear of reprisal.

2. ABOUT THIS POLICY STATEMENT

2.1. Purpose

The purpose of this policy statement is to:

- Help detect and address serious unlawful or inappropriate behaviour;
- Encourage individuals to report serious unlawful or inappropriate behaviour as required under the *Corporations Act 2001* (Cth) (**Corporations Act**);
- Provide information about the protections available to people who report serious unlawful or inappropriate behaviour;
- Provide information about how reports may be made, to who, and how Perkins will handle reports; and
- Help support and protect people who report serious unlawful or inappropriate behaviour.

2.2. Who is covered by this policy statement?

This policy statement applies to anyone who is a current or former employee or officer of Perkins, including labour hire workers, and all current and former associates to, contractors to and suppliers of Perkins (and their employees) and any relatives or dependents of those individuals.

In this policy statement each person in the categories listed above is referred to as an 'Eligible Whistleblower', and will qualify for protection as a whistleblower under the *Corporations Act* or *Taxation Administration Act 1953* (Cth) where applicable, if they make a disclosure or report of a Disclosable Matter (defined in section 2.3 below) directly to a Recipient or other external eligible recipient (defined in section 3.1 below).

2.3. What conduct is covered by this policy statement?

Conduct covered by this policy is referred to as a disclosable matter. 'Disclosable Matters' are covered by this policy statement, and are disclosures of serious instances of misconduct, wrongdoing or an improper state of affairs within Perkins.

Examples of Disclosable Matters include:

- illegal conduct such as theft, violence and criminal damage against property;
- fraud, money laundering or misappropriation of funds;
- offering or accepting bribes;
- financial irregularities; and
- legal or regulatory breaches or non-compliances.

Eligible Whistleblowers must not deliberately make a false report.

In order to qualify for protection under the Australian Whistleblower Laws, an Eligible Whistleblower making a report of unacceptable conduct must have reasonable grounds to suspect the unacceptable conduct is a Disclosable Matter. Wherever possible, they should include supporting information and evidence when making a report.

2.4. Conduct not covered by this policy statement

Disclosable Matters do not include personal work-related grievances (defined in section 1317AADA of the *Corporations Act*), such as:

- an interpersonal conflict between the discloser and an employee;
- a decision relating to the engagement, transfer or promotion of the discloser;
- a decision relating to the terms and conditions of engagement of the discloser; or
- a decision to suspend or terminate the engagement of the discloser, or otherwise to discipline the discloser.

These matters may be raised and reported in accordance with Perkins' Code of Conduct or Grievance Resolution Process, as applicable. Individuals can speak to a Human Resources representative for guidance on Perkins' Grievance Resolution Policy statement.

2.5. Availability of this policy statement and further information

This policy statement is available on the Perkins intranet and document management system for Perkins employees and other parties having such access. It is also available on the Perkins internet website.

Individuals can contact the Group Corporate Services Manager for further information on this policy statement.

3. REPORTING UNACCEPTABLE CONDUCT

3.1. How to make a report under this policy statement

Perkins encourages all Eligible Whistleblowers to speak to their line manager or Human Resources focal point in the first instance.

If an Eligible Whistleblower would like to make a report to an eligible Recipient under Australian Whistleblower Laws (and receive the protections under those laws), they can make a report of unacceptable conduct to:

- the Group Corporate Services Manager;
- General Manager; or
- Managing Director,

(Recipients)

Reports (including anonymous reports) can be made confidentially to any of the above Recipients.

Recipients may be contacted by phone 08 9721 7300, complaints@perkinsbuilders.com.au or by post to 1 Hales Street Bunbury WA 6230.

In limited circumstances, an Eligible Whistleblower may also make a disclosure of a Disclosable Matter to the following external eligible Recipients:

- ASIC, APRA or another Commonwealth body prescribed by the regulation (section 1317AA(1) of the Corporations Act);
- a legal practitioner for the purposes of obtaining legal advice (section 1317AA(3) of the Corporations Act); or
- a journalist or member of parliament where the Disclosure is an emergency disclosure or in the public interest in certain circumstances as prescribed in section 1317AAD of the Corporations Act.

3.2. How to make a report under this policy statement and what happens after a report is made

Where an Eligible Whistleblower contacts a Recipient to report a Disclosable Matter, they will have the option of either identifying themselves or remaining anonymous.

The Recipient will make a record of all the relevant information provided by the Eligible Whistleblower. As with named reporting, to allow Perkins to investigate the issue it is important that anonymous reports include sufficient information in relation to the Disclosable Matter.

The Recipient will refer the matter, along with the information provided by the Eligible Whistleblower, to the Group Corporate Services Manager.

Perkins will (internally or externally) assess the report to determine whether it is a Disclosable Matter that qualifies for protections under Australian Whistleblower Laws, whether it is appropriate to commence an investigation into the report, and whether that investigation should be conducted in accordance with this policy statement.

4. INVESTIGATING REPORTS OF UNACCEPTABLE CONDUCT

4.1. Commencement of an investigation

When Perkins decides that an investigation is necessary, Perkins will appoint an investigator who will conduct the investigation. Perkins reserves the right to refer the matter to an external investigator if deemed necessary.

Reports may not be able to be investigated if Perkins is not able to contact the individual who has made the report (e.g., because they have made an anonymous disclosure) and/or insufficient information has been provided to warrant an investigation.

4.2. How is an investigation carried out?

The investigator will be required to follow Perkins' standard policies for handling a complaint or disciplinary issue.

The investigator will:

- consider whether the conduct raised constitutes a disclosure that contains a Disclosable Matter and where it does, notify the Eligible Whistleblower of any other processes outside of the whistleblower process that can be taken to address the allegations;
- enable an investigation where necessary into the misconduct or improper state of affairs or circumstances;
- endeavour to keep the Eligible Whistleblower informed (if they can be contacted); and
- endeavour to document, report, and communicate to the Eligible Whistleblower the investigation findings.

4.3. What happens after an investigation?

The investigator will retain and keep secure any records of the Disclosable Matter and take all reasonable steps to keep confidential the information reported by the Eligible Whistleblower and any information which may lead to the Eligible Whistleblower's identity being revealed unless the Whistleblower has consented to the disclosure of their identity.

The investigation will conclude with a report, which will remain the property of Perkins. To the extent permitted under applicable laws and if determined appropriate by Perkins, Perkins may inform the Eligible Whistleblower, and/or a person against whom a disclosure has been made, of the findings. The method, timeframe, reporting and documenting of any investigation may vary depending on the nature and complexity of the disclosure. The extent of an investigation may be limited, for example, if Perkins is unable to contact the Eligible Whistleblower because a disclosure was made anonymously. There may be circumstances where it is not appropriate to provide details of the findings or outcome to the Eligible Whistleblower and/or a person against whom allegations have been made. Nothing in this Policy requires Perkins to provide a copy of its report to any individual.

4.4. What if I have been involved?

A person who has committed or been involved in unacceptable conduct will not be immune from disciplinary action merely because they have reported the unacceptable conduct in accordance with this policy statement. However, the person's conduct in making the report may be taken into account in determining what disciplinary action is appropriate.

5. PROTECTING PERSONS WHO REPORT UNACCEPTABLE CONDUCT

5.1. Will my identity be treated confidentially?

If an Eligible Whistleblower makes a report of unacceptable conduct under this policy statement, Perkins will take steps to ensure that person's identity is protected from disclosure to the extent required by law.

An Eligible Whistleblower who intends to make a report under this policy statement may make a request via the Group Corporate Services Manager or a Recipient for special protection measures if their identity is likely to be readily inferred from the nature of the information in the report.

Recipients or any other person with knowledge of the report must not disclose the Eligible Whistleblower's identity (including name, telephone number or email address) unless:

- the Eligible Whistleblower making the report consents to the disclosure;
- the disclosure is required by law;
- the disclosure is made to ASIC, APRA, the Commissioner of Taxation (if the report relates to Perkins' tax affairs) or the Australian Federal Police; or
- it is disclosed to a lawyer for the purpose of receiving advice in relation to legal obligations of protection and confidentiality.

Where a whistleblower requests anonymity, Perkins will not disclose their identity, or information likely to lead to the identification of the whistleblower, unless it is in the course of disclosing information to a prescribed government regulator, police or a legal practitioner, or where the whistleblower has provided their consent, or where Perkins is required to do so by law.

It is illegal for a person to disclose the identity of an Eligible Whistleblower who has made a report of a Disclosable Matter to a Recipient or other external eligible recipient as set out in section 3.1 of this policy statement, or to disclose information which is likely to lead to their identification, outside of the above circumstances.

Perkins will take all reasonable steps to ensure that any records relating to a report of unacceptable conduct are stored securely and confidentially and are able to be accessed only by Perkins staff who are authorised to access the information for the purposes of assessing or investigating the report.

An unauthorised disclosure of an Eligible Whistleblower's identity under this policy statement may be regarded as a disciplinary matter and dealt with in accordance with Perkins' disciplinary policy statements. If an Eligible Whistleblower believes there has been an unauthorised disclosure of their identity or information which is likely to lead to their identity being disclosed, they should report this to a Recipient. Reports of unauthorised disclosure may also be made to ASIC, APRA or the Commissioner of Taxation (if the original report related to Perkins tax matters) for investigation.

5.2. Will I be protected from retaliation if I make a report?

Perkins is committed to protecting and respecting the rights of Eligible Whistleblowers.

Perkins will not tolerate any actual or threatened (whether express or implied and whether or not there is any intention to carry out the threat or the Eligible Whistleblower who receives the threat fears that the threat will be carried out) reprisals (including dismissal or demotion), discrimination, bias, harassment, intimidation, victimisation or any other injury or damage to any person suspected of making a report of unacceptable conduct, or against that person's colleagues,

employer (if a contractor), relatives or any other person where the reason for the detrimental conduct relates to the suspicion that a person has made, may make, or could make a report of unacceptable conduct.

Any such retaliatory action may be an offense under Australian Law, treated as serious misconduct and/or dealt with in accordance with Perkins disciplinary procedures.

Reasonable administrative or management action does not amount to retaliatory action for the purposes of this section 5.2, including actions to protect an Eligible Whistleblower from detriment where they have made a report or performance management under Perkins' performance management framework.

If an Eligible Whistleblower believes that they have been subject to detrimental conduct they should report this to the Recipient set out in section 3.1 of this policy statement.

Reports of detrimental conduct may also be made to ASIC, APRA, or the Commissioner of Taxation (if the original report related to Perkins tax matters).

5.3. Are there any other protections available if I make a report?

Compensation and other remedies may be available through the courts (see section 1317AE of the Corporations Act). These protections apply not only to internal disclosures, but to disclosures to legal practitioners, regulatory and other external bodies, and public interest and emergency disclosures.

6. POLICY STATEMENT REVIEW, TRAINING AND CONTRACT DETAILS

6.1. How to make a report under this policy statement

Perkins will regularly monitor and review the effectiveness of the protections described in this policy statement.

7. APPLICABILITY

Responsibility for the application of this policy statement rests with all Perkins employees, contractors and joint venturers engaged in activities under Perkins' operational control. Perkins managers are also responsible for promotion of this policy statement in non-operated joint ventures.

This policy statement will be reviewed regularly and updated as required.



Managing Director
30th June, 2026